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December 29, 1997

*BY HAND DELIVERY*

Ms. Magalie R. Salas  
Secretary  
Federal Communications Commission  
1919 M Street, N.W.  
Washington, D.C. 20554

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DEC 29 1997

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

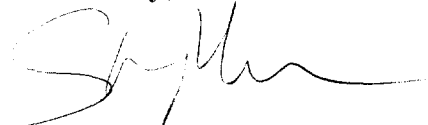
Re: Ex Parte  
PR Docket No. 92-235

Dear Ms. Salas:

Attached for filing please find an original and one copy of letters from Susan Pikrallidas of the American Automobile Association (AAA) to Chairman William E. Kennard, Commissioner Susan Ness, Commissioner Harold Furchtgott-Roth, Commissioner Michael K. Powell, Commissioner Gloria Tristani, and Daniel Phythyon, Chief, Wireless Telecommunications Bureau. Attached to each letter was a copy of the attached White Paper concerning AAA's pending Petition for Reconsideration in the above-referenced matter.

Please do not hesitate to call should you have any questions regarding this filing.

Sincerely,

  
Steven F. Morris

Enclosures

*0+1*  
*WTB*

BRUSSELS BUDAPEST LONDON MOSCOW PARIS\* PRAGUE WARSAW

BALTIMORE, MD BETHESDA, MD COLORADO SPRINGS, CO DENVER, CO LOS ANGELES, CA MCLEAN, VA

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\* Affiliated Office

Ms. Magalie R. Salas

December 29, 1997

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cc: Chairman William Kennard  
Commissioner Susan Ness  
Commissioner Harold Furchtgott-Roth  
Commissioner Michael Powell  
Commissioner Gloria Tristani  
Daniel Phythyon



DOCKET FILE COPY ORIGINAL

Washington Office  
1440 New York Avenue, N.W.  
Suite 200  
Washington, D.C. 20005  
202/942-2050  
FAX 202/783-4798

December 24, 1997

*BY HAND DELIVERY*

Commissioner Gloria Tristani  
1919 M Street, N.W.  
Room 826  
Washington, D.C. 20554

**RE: Docket PR No. 92-235**  
**White Paper of the American Automobile Association**

Dear Commissioner Tristani:

Enclosed for your review is a White Paper prepared by the American Automobile Association (AAA). The White Paper discusses the important public safety services provided by AAA to its members and to the driving public, the vital role of radio communications in performing those services and the threat to those services created by the Commission's *Second Report and Order* in PR Docket No. 92-235. To maintain the current level of service provided by AAA, the White Paper recommends providing AAA with greater control over the coordination of the Auto Emergency frequencies.

AAA met recently with Karen Gulick from your office to discuss these matters in greater detail. Should you have any questions regarding the White Paper or AAA's pending Petition for Reconsideration, please do not hesitate to call me (202/942-2061) or Gary Ruark (407/444-7749) from AAA, or Steven Morris (202/637-5756) of Hogan & Hartson.

Commissioner Gloria Tristani

12/24/97

Page 2

Best wishes for the holiday season.

Sincerely,

A handwritten signature in black ink, appearing to read "Susan Pikrallidas", with a long horizontal line extending to the right.

Susan Pikrallidas  
Managing Director -  
Government Relations

Enclosure

cc: Karen Gulick



Washington Office  
1440 New York Avenue, N.W.  
Suite 200  
Washington, D.C. 20005  
202/942-2050  
FAX 202/783-4798

December 24, 1997

*BY HAND DELIVERY*

Daniel Phythyon  
Chief  
Wireless Telecommunications Bureau  
Federal Communications Commission  
2025 M Street, N.W., Room 5002  
Washington, D.C. 20554

**Re: PR Docket No. 92-235**

Dear Mr. Phythyon:

Enclosed for your review is a White Paper prepared by the American Automobile Association (AAA). AAA has distributed copies of this White Paper to each of the Commissioners and their legal advisors. AAA also is meeting with each of the offices to discuss these matters in greater detail.

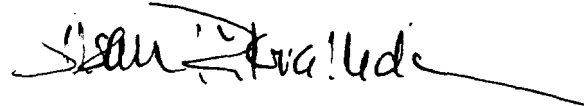
The White Paper discusses the important public safety services provided by AAA to its members and to the driving public, the vital role of radio communications in performing those services and the threat to those services created by the Commission's Second Report and Order in PR Docket No. 92-235. To maintain the current level of service provided by AAA, the White Paper recommends providing AAA with greater control over the coordination of the Auto Emergency frequencies.

Should you have any questions regarding the White Paper or AAA's pending Petition for Reconsideration, please do not hesitate to call me (202/942-2061) or Gary Ruark (407/444-7749) from AAA, or Steven Morris (202/637-5756) of Hogan & Hartson.

Daniel Phythyon  
12/24/97  
Page 2

Best wishes for the holiday season.

Sincerely,

A handwritten signature in black ink, appearing to read "Susan Pikrallidas", with a long horizontal flourish extending to the right.

Susan Pikrallidas  
Managing Director -  
Government Relations

Enclosure

cc: David Horowitz  
D'Wana Terry  
Herb Zeiler  
Ira Keltz



---

**Washington Office**  
1440 New York Avenue, N.W.  
Suite 200  
Washington, D.C. 20005  
202/942-2050  
FAX 202/783-4798

December 24, 1997

*BY HAND DELIVERY*

Commissioner Harold Furchtgott-Roth  
1919 M Street, N.W.  
Room 802  
Washington, D.C. 20554

**RE: Docket PR No. 92-235**  
**White Paper of the American Automobile Association**

Dear Commissioner Furchtgott-Roth:

Enclosed for your review is a White Paper prepared by the American Automobile Association (AAA). The White Paper discusses the important public safety services provided by AAA to its members and to the driving public, the vital role of radio communications in performing those services and the threat to those services created by the Commission's *Second Report and Order* in PR Docket No. 92-235. To maintain the current level of service provided by AAA, the White Paper recommends providing AAA with greater control over the coordination of the Auto Emergency frequencies.

We are looking forward to meeting with you on January 8 to discuss these matters in greater detail. Should you have any questions regarding the White Paper or AAA's pending Petition for Reconsideration, please do not hesitate to call me (202/942-2061) or Gary Ruark (407/444-7749) from AAA, or Steven Morris (202/637-5756) of Hogan & Hartson.

Commissioner Harold Furchtgott-Roth

12/24/97

Page 2

Best wishes for the holiday season.

Sincerely,

A handwritten signature in black ink, appearing to read "Susan Pikrallidas", with a long horizontal flourish extending to the right.

Susan Pikrallidas  
Managing Director -  
Government Relations

Enclosure

cc: Kevin Martin





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**Washington Office**  
1440 New York Avenue, N.W.  
Suite 200  
Washington, D.C. 20005  
202/942-2050  
FAX 202/783-4798

December 24, 1997

*BY HAND DELIVERY*

Chairman William E. Kennard  
1919 M Street, N.W.  
Room 814  
Washington, D.C. 20554

**RE: Docket PR No. 92-235**  
**White Paper of the American Automobile Association**

Dear Chairman Kennard:

Enclosed for your review is a White Paper prepared by the American Automobile Association (AAA). The White Paper discusses the important public safety services provided by AAA to its members and to the driving public, the vital role of radio communications in performing those services and the threat to those services created by the Commission's *Second Report and Order* in PR Docket No. 92-235. To maintain the current level of service provided by AAA, the White Paper recommends providing AAA with greater control over the coordination of the Auto Emergency frequencies.

AAA met recently with Ari Fitzgerald from your office to discuss these matters in greater detail. Should you have any questions regarding the White Paper or AAA's pending Petition for Reconsideration, please do not hesitate to call me (202/942-2061) or Gary Ruark (407/444-7749) from AAA, or Steven Morris (202/637-5756) of Hogan & Hartson.

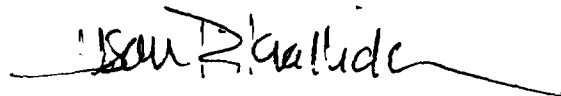
Chairman William E. Kennard

12/24/97

Page 2

Best wishes for the holiday season.

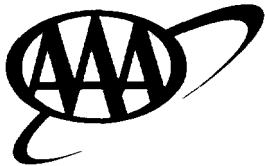
Sincerely,

A handwritten signature in black ink, appearing to read "Susan Pikrallidas", with a long horizontal flourish extending to the right.

Susan Pikrallidas  
Managing Director -  
Government Relations

Enclosure

cc: Ari Fitzgerald



---

**Washington Office**  
1440 New York Avenue, N.W.  
Suite 200  
Washington, D.C. 20005  
202/942-2050  
FAX 202/783-4798

December 24, 1997

*BY HAND DELIVERY*

Commissioner Susan Ness  
1919 M Street, N.W.  
Room 832  
Washington, D.C. 20554

**RE: Docket PR No. 92-235**  
**White Paper of the American Automobile Association**

Dear Commissioner Ness:

Enclosed for your review is a White Paper prepared by the American Automobile Association (AAA). The White Paper discusses the important public safety services provided by AAA to its members and to the driving public, the vital role of radio communications in performing those services and the threat to those services created by the Commission's *Second Report and Order* in PR Docket No. 92-235. To maintain the current level of service provided by AAA, the White Paper recommends providing AAA with greater control over the coordination of the Auto Emergency frequencies.

AAA met recently with David Siddall from your office to discuss these matters in greater detail. Should you have any questions regarding the White Paper or AAA's pending Petition for Reconsideration, please do not hesitate to call me (202/942-2061) or Gary Ruark (407/444-7749) from AAA, or Steven Morris (202/637-5756) of Hogan & Hartson.

Commissioner Susan Ness  
December 24, 1997  
Page 2

Best wishes for the holiday season.

Sincerely,

A handwritten signature in black ink, appearing to read "Susan Pikrallidas", with a long horizontal flourish extending to the right.

Susan Pikrallidas  
Managing Director -  
Government Relations

Enclosure

cc: David Siddall



---

**Washington Office**  
1440 New York Avenue, N.W.  
Suite 200  
Washington, D.C. 20005  
202/942-2050  
FAX 202/783-4798

December 24, 1997

*BY HAND DELIVERY*

Commissioner Michael K. Powell  
1919 M Street, N.W.  
Room 844  
Washington, D.C. 20554

**RE: Docket PR No. 92-235**  
**White Paper of the American Automobile Association**

Dear Commissioner Powell:

Enclosed for your review is a White Paper prepared by the American Automobile Association (AAA). The White Paper discusses the important public safety services provided by AAA to its members and to the driving public, the vital role of radio communications in performing those services and the threat to those services created by the Commission's *Second Report and Order* in PR Docket No. 92-235. To maintain the current level of service provided by AAA, the White Paper recommends providing AAA with greater control over the coordination of the Auto Emergency frequencies.

We are looking forward to meeting with you on January 8 to discuss these matters in greater detail. Should you have any questions regarding the White Paper or AAA's pending Petition for Reconsideration, please do not hesitate to call me (202/942-2061) or Gary Ruark (407/444-7749) from AAA, or Steven Morris (202/637-5756) of Hogan & Hartson.

Commissioner Michael K. Powell

12/24/97

Page 2

Best wishes for the holiday season.

Sincerely,

A handwritten signature in black ink, appearing to read "Susan Pikrallidas", with a long horizontal flourish extending to the right.

Susan Pikrallidas  
Managing Director -  
Government Relations

Enclosure

cc: Peter Tenhula

# **AAA WHITE PAPER**

## **The Need for “Safety” Treatment of Frequencies in the Automobile Emergency Radio Service**

**Gary Ruark**

**Communications Specialist**

**AAA Emergency Road Service**

**December 1997**

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## PREFACE

The American Automobile Association ("AAA") is a federation of 90 clubs serving more than 40 million members. AAA responds to more than 30 million road service calls each year -- more than 80,000 calls per day. AAA also works with state and local governments to help manage traffic accidents and responds to calls for assistance when disaster strikes.

Since the early 1940s, AAA has used two-way voice radios for mobile communication. In the 1950s, the Commission established specific frequencies for auto clubs by creating the Automobile Emergency Radio Service (AERS). AAA coordinated road service providers' FCC radio station applications prior to the organized frequency advisory committees established in 1986. AAA also was the frequency advisory committee for AERS frequencies until October 17, 1997, when the rules adopted by the Commission in its *Refarming Order* took effect.<sup>1</sup> In its role as frequency coordinator, AAA thoroughly understands the needs of road service and how to efficiently and effectively use frequency assignments.<sup>2</sup>

AAA's exclusive frequency coordination recommendations for AERS frequencies have been critical to the success and ability of road service providers to serve the motoring public. AAA understands the demands placed on these frequencies and is careful to avoid

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<sup>1</sup> Consolidation of the Private Land Mobile Radio Service, Second Report and Order, PR Docket 92-235.

<sup>2</sup> It should be noted that while AAA coordinated all of the AERS frequencies, only certain of the frequencies were reserved for auto clubs. As shown in the attached table, many of the AERS frequencies are used by other road service providers, such as independent tow trucks and locksmiths.

assignments that would interfere or delay a road service provider's ability to dispatch emergency calls when called on by citizens for emergency assistance. Interference results in delays. It takes longer for road service dispatchers to send messages and longer for emergency road service vehicle operators to provide needed assistance. The need for prompt communication in emergency situations is critical. And a tremendous volume of calls must be dispatched. Thus co-channel sharing or adjacent channel interference is unacceptable.

The rules adopted by the Commission in the *Refarming Order* eliminate AAA's exclusive ability to make coordination recommendations for AERS frequencies. Instead, the rules permit any coordinator in the newly-formed Industrial/Business Pool to make these recommendations. That increases the likelihood of improper frequency assignments and increases the potential for interference on the AERS frequencies -- delaying AAA's ability to respond to emergency road service calls. Any such delay is not in the interest of the public. We recommend that the Commission require all frequency coordination recommendations in the AERS frequencies be approved by AAA.

## **I. A HISTORY OF PUBLIC SERVICE**

AAA is a federation of 90 auto clubs dedicated to promoting the safety of motorists. A not-for-profit company, AAA was organized in 1902 and incorporated in Connecticut in 1910. AAA recently passed a milestone in its 95-year history -- the 40 millionth member joined the association.

Initially, AAA was founded to improve driving conditions. In 1902, the United States lagged Europe in paved roads, adequate maps and road signs. AAA spent its first two decades campaigning for better driving conditions, developing maps and marking/signing roads across the United States. The existing federal and state highway systems exist, in large part, because of the efforts of AAA. Once the highway system improved and mass production of the automobile made it more affordable, the nation began its love affair with the automobile.

It soon became apparent some form of emergency road service assistance was necessary. Automobiles were affordable. But neglect, substandard maintenance, and poor or primitive engineering and road conditions made cars prone to breakdown. AAA's response was to offer emergency road service.

Over the years, the use of radio dispatch helped AAA grow substantially. Today, AAA responds to some 80,000 emergency road service calls daily. Maintaining open communication channels is absolutely critical to this effort. AAA dispatches a road service call every 4.5 seconds from one of 95 communications centers nationwide to more than 34,000 mobile units.<sup>3</sup> Multiple transmitters and sites allow large coverage areas using mobile radio equipment. The emergency road service provider's ability to provide efficient and timely emergency road service depends on the radio infrastructure.

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<sup>3</sup> From AAA's 1996 emergency road service statistical reports.

The average age of automobiles (almost 9 years) on the road is increasing, and so are the number of road service incidents.<sup>4</sup> Between 1995 and 1996, AAA road service incidents increased 8.1 percent.<sup>5</sup> This increased volume requires additional road service equipment. The equipment requires two-way radio communication with AAA dispatchers. As AAA's service demands increase, the need for and dependency on radio communication increases accordingly.

AAA's role is not limited to starting dead batteries. AAA serves a much broader and more important role. AAA provides emergency services to members, assists non-members in finding and dispatching road service providers, assists with traffic incident management and disaster relief, works with state and local government agencies, and much more. AAA's long-standing record of providing safety services is unparalleled in our nation's history.

#### *A. Emergency Services*

Last year AAA responded to 30 million emergency road service calls. Approximately 8.5 million of those calls involved emergency situations in which there was risk of danger to health or property. A full 3.1 million of those calls involved situations in which members were traveling in unfamiliar areas.<sup>6</sup> To AAA, these incidents are priorities, resulting in the immediate dispatch of a service vehicle. When AAA

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<sup>4</sup> Increasingly complex, proprietary automotive technology has made it difficult for the consumer to maintain, even understand their vehicles.

<sup>5</sup> From AAA's 1996 emergency road service statistical reports.

<sup>6</sup> From AAA 1996 Road Service Statistical Report.

receives a call for help, the dispatcher requests that the member allow AAA to send a public safety official to their assistance. If members report their safety is threatened, AAA automatically contacts a public safety agency for help. Many AAA clubs have direct phone lines to public safety agencies. Others have the numbers programmed into their emergency road service counselors' phones. AAA's 95-year history is marked by dedication to members and the motoring public. AAA clubs routinely work directly with appropriate public safety officials to respond to all emergency requests for assistance.

The wide variety of emergency road service incidents includes such things as oxygen canisters locked in cars; babies locked in running cars; disoriented elderly people who call AAA for help; members who experience heart attacks in their cars, which requires AAA to call public safety officials and render assistance; members lost in snow storms; and members who suffer from heat stroke in the desert. AAA drivers have helped deliver babies, delivered medicine, and ferried doctors to hospitals. While providing emergency road service, AAA professionals have been shot, beaten, threatened, robbed and killed.<sup>7</sup> Radio communication between the road service fleet and AAA dispatch centers provides road service professionals the necessary means to seek and/or provide help.

#### ***B. Highway Safety and Traffic Incident Management***

In Los Angeles, San Francisco, Philadelphia, Detroit and other locations, AAA has roving patrols on some major metropolitan highways to offer assistance to stranded motorists. This service is provided at no charge to the general public and in cooperation

with public safety agencies. In some parts of California, AAA receives and handles calls from the public roadside emergency call boxes installed for highway safety purposes by local municipalities. Using AAA to perform these services relieves public safety agencies of these functions and allows them more time to devote to other efforts.

Daily, AAA helps relieve traffic congestion by removing vehicles from crowded roadways. Most vehicles that require towing break down somewhere in route -- not in a parking lot or driveway. Almost all of AAA's annual 12.5 million emergency road service calls which involve towing from the scene of disablement, require AAA to manage and resolve traffic incidents.<sup>8</sup> Every time a vehicle blocks traffic, congestion occurs and motorists experience delays, accidents, increased fuel consumption and aggravation. The faster the cause of the congestion can be eliminated, the quicker traffic patterns will return to normal and safe driving conditions will be restored.

AAA's fleet reacts quickly and intelligently to these incidents. The clear AAA club dispatch to the mobile radio unit via the AERS frequencies makes it all possible. Being in constant contact with the emergency road service fleet lets AAA direct the nearest and/or most available truck to the scene. Therefore, problems are resolved much more quickly. AAA drivers are trained professionals and know how to handle these situations. And AAA professionals work hand-in-hand with public safety agencies.

Public safety agencies use the AAA fleet because they know AAA has ample and diverse equipment, trained road service professionals and the ability to respond quickly.

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<sup>7</sup> From interviews with AAA Club staff, newspaper articles and tape recorded road service calls.

When public safety officials are at the scene, AAA and other road service personnel take instructions from them. More often than not, public safety officials leave when AAA arrives, entrusting AAA to remove the vehicle and clear the roadway of debris. Either way, the goal is to help the stranded motorist and remove the vehicle as quickly as possible to a safer location so that normal traffic patterns can resume.

In addition, AAA's emergency road service professionals routinely report traffic accidents, debris in the road, traffic lights that are malfunctioning, etc. to AAA clubs who, in turn, relay the information to the appropriate public safety agency.

### *C. Assistance to State and Local Governments*

A common misperception is that AAA services benefit only AAA members. The truth is local and state government agencies rely on AAA for assistance, and AAA's commitment to public service is unwavering. Examples include:

- During the October 1989 Oakland, California earthquake, public safety authorities requested that anyone having portable radio equipment make it available for search and rescue. The AAA club in San Francisco loaned its mobile command post, and later its road service fleet, to public safety for rescue operations. The mobile command post became the public safety agencies' lifeline. Later, the public safety department built its own mobile command post based on AAA's design. This AAA club also loaned its mobile command radio station and fleet to the Red Cross and mayor's office for special events. During the 1997 Mayor's Conference in San Francisco, AAA provided the transportation services,

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<sup>8</sup> Id.

which were coordinated using the AERS frequencies with the local police department.<sup>9</sup>

- In 1992, Hurricane Andrew swept through south Florida, destroying everything in its path. Public telephones, cellular telephones, and the communications of the National Weather Service's Hurricane Center were wiped out, as were most of the local governments' communications systems. Although the AAA dispatch center in south Miami sustained damage (the roof-mounted communications antenna was blown down and water penetrated the building, knocking out the base stations), AAA was able to establish a generator and portable antenna/base station, allowing AAA to resume dispatching. Public safety and AAA joined forces to use the AAA communications system and road service fleet to ferry disaster agency personnel and communications from one disaster site to another. Tow trucks removed debris from the roadways so that emergency rescue and police vehicles could reach the inhabitants. The same equipment was then used to lift debris so that rescue workers could reach the injured. Later, tow trucks were used to move portable housing into the area.<sup>10</sup>
- In the summer of 1997, Charlotte, North Carolina experienced severe flooding. The local AAA club responded by using emergency road service equipment to pull vehicles from rushing streams and remove fallen trees from roadways.
- In the winter of 1995, Chicago had temperatures 20 degrees below zero. Vehicles wouldn't start, and people were left stranded. AAA kept its trucks

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<sup>9</sup> Obtained from California State Automobile Association employee interviews.

<sup>10</sup> Obtained from AAA Florida employee interviews.



running 24 hours a day whether they were parked or not. The local AAA club ferried doctors and nurses to and from hospitals in tow trucks because the public safety vehicles were busy with other problems or immobilized by the cold.<sup>11</sup>

- In a number of jurisdictions, the road service fleet is put at the disposal of local municipalities during periods of snow emergencies. Road service vehicles are used to reach stranded motorists and extricate their vehicles from the snow. Rescuing people is of immediate concern because hypothermia can set in quickly. Often the vehicles are “plowed in” requiring road service professionals to coordinate their activities with highway maintenance departments. Activities are coordinated using radio equipment.<sup>12</sup>

Over the years the AAA frequency coordinator, through inter-service sharing, has assigned AERS frequencies to more than 150 different public safety departments, many within the last two years. One result of the *Refarming Order* is that it is no longer possible to routinely share between the Industrial/Business and Public Safety Pool. Nevertheless, AAA will continue to monitor assignments by other Industrial/Business Pool frequency coordinators on the AERS frequencies. If a concern arises, AAA will contact the appropriate public safety coordinator, make them aware of the situation and let them respond to the other coordinator.

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<sup>11</sup> Obtained from AAA Chicago Motor Club employee interviews.

<sup>12</sup> Obtained from AAA Western New York, AAA Chicago Motor Club, AAA Mountain West, AAA Northern New England, etc. employee interviews.